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THE DEPARTMENT OF TRANSPORTATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

SHANE SHANNON,

Plaintiff,

V.

PETER BUTTIGIEG, Secretary of the
UNITED STATES DEPARTMENT
OF TRANSPORTATION.

Defendant.

Case No. 3:20-cv-04281-EMC

**STIPULATION REGARDING DISPOSITIVE
MOTION HEARING DEADLINE AND
BRIEFING SCHEDULE; [PROPOSED] ORDER**

The Honorable Edward M. Chen

WHEREAS, the dispositive motion hearing deadline in the above-captioned case is June 2, 2022 (ECF No. 49);

WHEREAS, defendant intends to file its motion for summary judgment on April 28, 2022, 35 days before June 2, 2022, as required by Civil Local Rule 7-2(a);

WHEREAS, while preparing the motion for summary judgment, counsel for defendant checked the Court's scheduling notes and learned that the Court is unavailable on June 2, 2022;

WHEREAS, the parties met and conferred and agreed that defendant will file its motion for summary judgment on April 28, 2022, as previously scheduled, and that the parties are available for a

1 hearing on defendant's motion for summary judgment on June 30, 2022; and

2 WHEREAS, the parties also agreed that plaintiff should have until May 19, 2022 to file his
3 opposition brief and defendant should have until June 2, 2022 to file its reply brief.

4 NOW THEREFORE, the parties request, subject to Court approval, that the dispositive motion
5 deadline in this case be extended until June 30, 2022, that plaintiff be permitted to file his opposition brief
6 on or before May 19, 2022, and defendant be permitted to file its reply brief on or before June 2, 2022.

7 DATED: April 27, 2022

Respectfully submitted,

8 STEPHANIE M. HINDS
United States Attorney

9 /s/ Jevechius D. Bernardoni*
10 JEVECHIUS D. BERNARDONI
11 Assistant United States Attorney

12 Attorneys for Federal Defendant
13 PETER BUTTIGIEG, SECRETARY
FOR THE DEPARTMENT OF
TRANSPORTATION

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15 DATED: April 27, 2022

/s/ Corey B. Bennett

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27 Attorneys for Plaintiff

1 *In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury
2 that all signatories have concurred in the filing of this document.
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1 [PROPOSED] ORDER
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3 Pursuant to the parties' stipulation, and GOOD CAUSE APPEARING, the dispositive hearing
4 deadline shall be extended until June 30, 2022, plaintiff may file his opposition brief on or before May 19,
5 2022, and defendant may file its reply brief on or before June 2, 2022, as noted in the parties' stipulation.

6 IT IS SO ORDERED.
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8 Dated: _____
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10 _____
11 THE HONORABLE EDWARD M. CHEN
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